

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
Eastern Division**

GROVER GAMING, INC., and)	
)	
BANILLA GAMES, INC.,)	
)	
Plaintiffs,)	
)	
v.)	Case No.
)	
ANIL PATEL d/b/a EZ QUICK MART,)	
)	
Defendant.)	

DECLARATION OF HARRY YIATRAS

Harry Yiatras deposes and says:

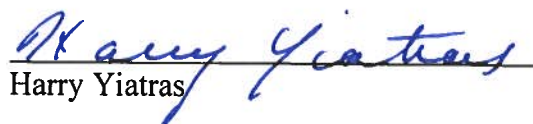
1. I am over 18 years of age and I am fully able to make the statements set forth in this Declaration.
2. The statements contained in this Declaration are made of my own volition and are true of my own personal knowledge.
3. I visited the EZ Quick Mart store ("EZ Store") located at 80 Meramec Valley Plaza, Valley Park, Missouri 63088 on October 18, 2021.
4. On that date, I noted the presence in the EZ Store of a gaming machine that featured a game entitled Fusion 4 (the "Fusion 4 Gaming Machine").
5. Also on October 18, 2021, I took a number of photos of the screen displays that appeared on the video screen of the Fusion 4 Gaming Machine. See attached Exhibit 1.
6. The screen displays of the Fusion 4 Gaming Machine displayed game titles including PLUNDERIN' PIRATES, THE GREAT TRAIN ROBBERY, PIGGY'S

BIG BREAK, RED HOT BUFFALO, and KING KONG. Photos of screen shots showing these game titles are attached as Exhibit 1.

7. I played the Fusion 4 Gaming Machine on that date and took video shots of the screen display during the game play.

I hereby declare, under penalty of perjury, that the foregoing is true and correct.

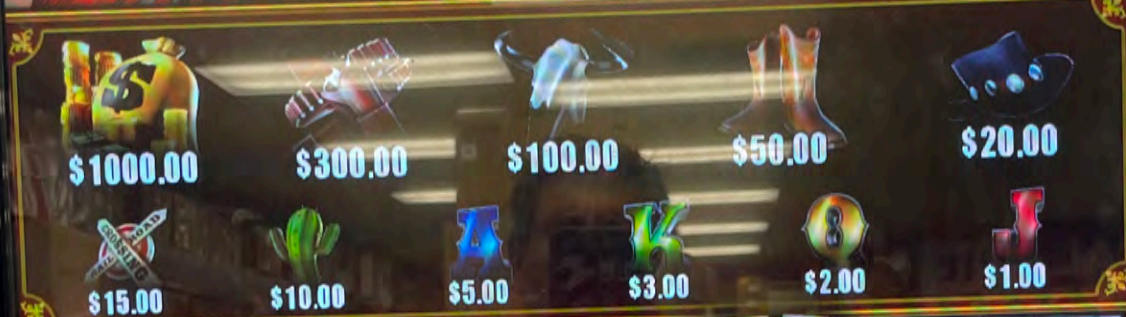
This is the 22nd day of November, 2021.


Harry Yiatras

\$705.44 TO BE ELIGIBLE
PLAY FOR AT LEAST \$20.00

\$64.38

\$13.28



ICON SWAP

Once the symbols are shown, occasionally a lasso will reveal around two icons and swap their position. Up to 4 symbols can swap positions through the lasso feature. Once the lasso feature is complete, nudge options are shown



MAIN RULES **LOCKED IN WILD** **ICON SWAP** **BOTTLE MULTIPLIER** **BONUS GAME** **HOW TO NUDGE**

CLOSE



GRAND PRIZE
\$205.94
 TO BE ELIGIBLE
 PLAY FOR AT LEAST \$20.00

MAJOR PRIZE
\$64.38

MINOR PRIZE
\$13.20

THE GREAT TRAIN ROBBERY

\$1000.00	\$300.00	\$100.00	\$50.00	\$20.00
\$15.00	\$10.00	\$5.00	\$3.00	\$2.00
				\$1.00

HOW TO NUDGE

Once the symbols are shown, press the **PLAY** button. If a new play begins, you didn't have a possible match. If a new play does not begin, there is a possible match on the screen! To nudge, select **RAISE** or **LOWER** to move a reel one position up or down. The goal is to line up 3 matching symbols on the Center Payline.

MAIN RULES **LOCKED IN WILD** **ICON SWAP** **BOTTLE MULTIPLIER** **BONUS GAME** **HOW TO NUDGE**

CLOSE

GRAND PRIZE

\$205.94


TO BE ELIGIBLE
PLAY FOR AT LEAST \$20.00

MAJOR PRIZE


\$64.38

MINOR PRIZE


\$13.20




THE GREAT TRAIN ROBBERY




\$1000.00




\$300.00




\$100.00




\$50.00




\$20.00



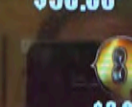
\$15.00



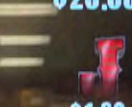
\$10.00



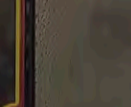
\$5.00



\$3.00






\$2.00



\$1.00

LOCKED IN WILD



Any time a WILD symbol lands it expands, making the entire reel wild. The wild reel will remain for a random number of spins. There are no nudge options for the wild reel. It is considered a wild and substitutes for all symbols.

MAIN RULES


LOCKED IN WILD

ICON SWAP


BOTTLE MULTIPLIER

BONUS GAME

HOW TO NUDGE



CLOSE



GRANDPRIZE
\$205.94
 TO BE ELIGIBLE
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MAJOR PRIZE
\$64.38

MINOR PRIZE
\$13.20

PIGGY\$
BIG BREAK



\$1000.00	\$300.00	\$100.00	\$50.00	\$20.00	\$15.00	\$10.00	\$5.00	\$2.00	\$1.00

WILD MINI-SLOT

- Winning with the triggers a mini slot game. The wild only appears in the center reel. Following the win, a secondary slot game within the Piggy Bank occurs and spins once for the chance at winning unique prizes with unique symbols.
- Line pays must occur on adjacent reels, beginning with the leftmost reel.



PAYS:						
	Opens the Piggy Bank	\$10.00	\$5.00	\$3.00	\$2.00	\$1.00

MAIN
RULES

WILD
MINI-SLOT

RANDOM
CASH GRAB

FREE
GAMES

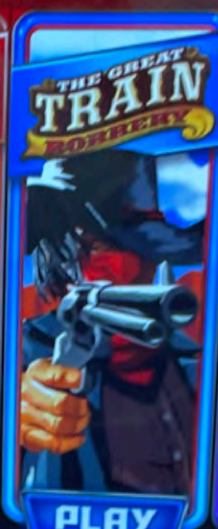
HOW-TO
NUDGE

CLOSE

\$64.38

MINOR PRIZE

\$13.20



COLLECT

CREDITS

\$0.00






\$205.94
TO BE ELIGIBLE
PLAY FOR AT LEAST \$20.00


\$64.38

\$13.20

HOW TO NUDGE

- Once the symbols are shown, press the  button. If a new play begins, you didn't have a possible match. If a new play does not begin, there's a possible match on the screen!

- To Nudge, select  or  to move a reel one position up or down.

The goal is to line up 3 matching symbols on the Center Payline. 



ON

MAIN
RULES

STAMPEDE

FREE
GAMES

HOW TO
NUDGE

RULES

CREDITS

CLOSE


PLAY AMOUNT











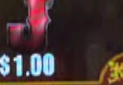
GRAND PRIZE
\$205.94
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MAJOR PRIZE
\$64.38


MINOR PRIZE
\$13.20


THE GREAT TRAIN ROBBERY



 \$1000.00	 \$300.00	 \$100.00	 \$50.00	 \$20.00
 \$15.00	 \$10.00	 \$5.00	 \$3.00	 \$2.00
 \$1.00				

BONUS GAME

Line up 3  symbols on the payline to trigger the Bonus Game. Pick objects to reveal winnings. Objects can reveal instant prizes or additional picks. Picking three objects in a car advances to a new car. The fourth cart is the final cart and contains only instant prizes



MAIN RULES **LOCKED IN WILD** **ICON SWAP** **BOTTLE MULTIPLIER** **BONUS GAME** **HOW TO NUDGE**

CLOSE



GRAND PRIZE
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MAJOR PRIZE
\$64.38

MINOR PRIZE
\$13.20

PLUNDERIN' PIRATES

\$1000.00
 \$200.00
 \$100.00
 \$50.00
 \$25.00
 \$10.00
 \$5.00
 \$2.00
 \$1.00

NO QUARTER!

PICKING THE NO QUARTER! BONUS FROM THE BONUS PICK GAME TRIGGERS THE NO QUARTER! BONUS. THE GAME WILL TRANSITION TO A BONUS SCENE THAT HAS 5 CANNONS WITH A CORRESPONDING SINGLE ICON REEL BELOW THE CANNON. THE GAME WILL BEGIN WITH EACH REEL SPINNING. ONCE THE FIRST TURN STARTS, A PIRATE SHIP WILL MOVE INTO VIEW DISPLAYING A PRIZE VALUE. ONCE THE SHIP IS IN VIEW, THE REELS WILL BEGIN TO STOP, REVEALING ONE OF 3 DIFFERENT SYMBOLS.

BLANK: THIS CANNON DOES NOTHING FOR THE TURN

FIRE: THE CANNON FIRES AT THE SHIP AND AWARDS THE SHIP'S PRIZE FOR THAT CANNON

LOSE CANNON: THIS DESTROYS THE CORRESPONDING CANNON FOR THE REMAINDER OF THE BONUS

ONCE EACH REEL HAS STOPPED, ALL THE REELS FOR THE REMAINING CANNONS WILL BEGIN SPINNING AGAIN. THE BONUS CONTINUES PLAYING UNTIL ALL THE CANNONS ARE DESTROYED.

MAIN RULES CLOSE ENOUGH SAILIN' WILD BONUS PICK KRAKEN ATTACK! NO QUARTER! HOW TO NUDGE

CLOSE

GRAND PRIZE

\$205.94

TO BE ELIGIBLE
PLAY FOR AT LEAST \$20.00

MAJOR PRIZE

\$64.38

MINOR PRIZE

\$13.20

PLUNDERIN' PIRATES



SAILIN' WILD



THE SAILIN' WILD FEATURE IS TRIGGERED WHEN THE APPEARS ON THE LAST REEL. THIS FEATURE WILL GRANT ADDITIONAL SPINS WITH THE STAYING ON THE BOARD. IF NO WIN IS PRESENT AFTER EACH SPIN, ANOTHER SPIN WILL OCCUR. EACH SPIN, THE WILL MOVE LEFT ONE POSITION. THE FEATURE ENDS WHEN A WIN OCCURS OR THE WILD LEAVES THE REELS. WILD SUBSTITUTES FOR ALL SYMBOLS, EXCEPT OR .

MAIN RULES

CLOSE ENOUGH

SAILIN' WILD

BONUS PICK

KRAKEN ATTACK!

NO QUARTERS!

HOW TO NUDGE

CLOSE